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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MATTHEW K. BECK,

Plaintiff,

v.

CAROLYN W. COLVIN,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:15-cv-00039-APG-VCF

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”) respectfully requests that the Court extend the time for Defendant to file her Answer to the Complaint, due on March 13, 2015, by 30 days, through and including April 13, 2015 (April 12, 2015 lands on a Sunday).

An extension of time is needed in order to prepare Defendant’s Answer because the Commissioner is still in the process of assembling and finalizing the administrative record. This request is made in good faith with no intention to unduly delay the proceedings.

1 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,
2 on March 5, 2015.

3 Respectfully submitted this 5th day of March 2015.

4 DANIEL G. BOGDEN
5 United States Attorney

6 /s/ Carolyn B. Chen
7 CAROLYN B. CHEN
8 Special Assistant United States Attorney

9 OF COUNSEL:

10 DONNA L. CALVERT
11 Regional Chief Counsel, Region IX

12 Dated this 6th of March, 2015

13 IT IS SO ORDERED:

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15 CAM FERENBACH
16 UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE

I, **CAROLYN B. CHEN**, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

CM/ECF:
Marc Kalagian, Law Offices of Rohlring & Kalagian, LLP
(Attorney for Plaintiff)

Dated this 5th day of March 2015.

/s/ Carolyn B. Chen
CAROLYN B. CHEN
Special Assistant United States Attorney